



**Rocky Mountain
Remediation Services, L.L.C.**
... protecting the environment

ats Environmental Technology Site

464

Colorado 80402-0464

(303) 966-2678

(303) 966-8244

97 - RF -

DIST.	LTR	ENC
BARTHEL, J.M.		
BENDEL, P.R.		
BENSON, C.A.		
CARMAN, C.H.		
DAWSON, D.		
EDWARDS, J.D.		
FINDLEY, M.E.		
FITZ, R.C.		
GUINN, L.A.		
HUGHES, F.P.		
MCANALLY, J.L.		
POWER, A.P.		
REED, A.B.		
RYSON, A.M.		
WAGNER, M.J.		
WHEELER, M.		

April 2, 1997

Eileen M. Simmons, Manager
Analytical Services
Kaiser-Hill Company, L.L.C.
Rocky Flats Environmental Technology Site

DATA SUMMARY REPORTS AND BACKUP DATA FOR THE CERCLA ADMINISTRATIVE RECORD - LLT-008-97

This letter provides follow-up to telephone conversations between you, Greg DiGregorio, RMRS QA, Virgene Ideker, and me relative to the subject reports and related backup data. My organization is responsible for capturing and maintaining documents relating to CERCLA activities at Rocky Flats, and ensuring that those documents are reviewed for possible inclusion in the DOE RFFO CERCLA Administrative Record.

OSWER Directive No. 9833.3A-1 states that verified sampling data and chain of custody forms do not have to be placed physically in AR files, but must be incorporated in the AR file by reference (i.e., in the index). The directive further states that "Data summary sheets, ... must be located in the record file. The index must list the data summary sheets, reference the underlying verified sampling data, and indicate where the sampling data can be found." Data summary reports were sent to us directly by Quantalex, Inc. until July, 1995. Since that time, we have not received the reports from Analytical Services.

I have spoken with Virgene Ideker and verified that sampling data and chain of custody forms are available through the Analytical Services organization. Documentation that this information is available on site through the Administrative Record organization is being placed in each AR file. My staff will in turn coordinate any requests for that information through your office. Please take the action necessary to ensure that this information is archived with the retention period specified in the Rocky Flats Cleanup Agreement for the CERCLA Administrative Record files. I have attached a copy of that section for your reference.

As part of an internal assessment, a search was made for data summary reports included in the AR files. It appears that data summary reports have not been forwarded to the Administrative Records organization for FY96 or FY97.

If you have any questions, or require additional information, please call the undersigned at extension 4580, or Greg DiGregorio at extension 5688.

Laura L. Tyler
Laura L. Tyler

Technical Lead, Records Management
Rocky Mountain Remediation Services, L.L.C.

LLT:cb

Attachment:
As Stated

cc:
L. M. Brooks
V. L. Ideker

ADMIN RECORD

A-54-002351

FINAL ROCKY FLATS CLEANUP AGREEMENT

1 268. All Parties shall make available to each other and the public results of sampling, tests, or other
2 data with respect to the implementation of this Agreement as specified in the IMP or appropriate
3 sampling and analysis plan. If quality assurance is not completed within the time frames
4 specified in the IMP or appropriate sampling and analysis plan, raw data or results shall be
5 submitted upon the request of EPA or CDPHE. In addition, quality assured data or results shall
6 be submitted as soon as they become available.
7

8 269. Consistent with Part 30 (Classified and Confidential Information), DOE shall permit EPA,
9 CDPHE, or their authorized representatives to inspect and copy, at reasonable times, all records,
10 files, photographs, documents, and other writing, including sampling and monitoring data,
11 pertaining to work undertaken pursuant to this Agreement.
12

13 270. By the end of FY 1996, the Parties will establish a mutually agreed-upon mechanism to
14 exchange verified and validated monitoring data between the Parties and the cities of
15 Westminster and Broomfield in a timely and efficient manner.
16

PART 24 RETENTION OF RECORDS

17
18
19 271. DOE shall preserve all agency records and documents in its possession or in the possession of
20 its employees, agents, contractors or subcontractors which relate in any way to the presence of
21 hazardous substances, pollutants, and contaminants at the Site for the duration of this Agreement
22 or for a term consistent with the longest duration required by the NCP, RCRA, CHWA, or the
23 DOE records retention schedules then in effect at the termination of this Agreement. DOE
24 retention schedules are developed in accordance with the National Archives and Records
25 Administration records management handbook, Disposition of Federal Records (NSN 7610-01-
26 055-8704). All such records and documents so retained shall be proposed for permanent
27 retention in accordance with 36 CFR 1228.28(b). DOE shall make all such records or
28 documents available to CDPHE and the EPA upon request.
29

PART 25 ACCESS

30
31
32 272. Without limitation on any authority conferred on EPA or CDPHE by statute, regulation, court
33 order, or agreement, EPA, CDPHE, and/or their authorized representatives, with proper safety
34 and security clearances, shall have authority to enter RFETS at all reasonable times, with or
35 without advance notification for the purposes of, among other things:
36

- 37 a. inspecting records, operating logs, contracts, and other documents directly related to
38 implementation of this Agreement;
39
- 40 b. reviewing the progress of DOE or its contractors in implementing this Agreement;
41
- 42 c. conducting such tests as the EPA or State Project Coordinator deems necessary; or
43
- 44 d. verifying the data submitted to EPA and/or CDPHE by DOE.
45

46 Nothing in this paragraph shall be construed as a waiver of the attorney-client privilege.
47